



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
ALASKA OPERATIONS OFFICE
Room 537, Federal Building
222 W. 7th Avenue, #19
Anchorage, Alaska 99513-7588

April 6, 2005

Ms. Ella Ede
Environmental Project Manager
Northern Dynasty Mines, Inc.
3201 C Street
Anchorage, AK 99503

Dear Ms. Ede,

Enclosed are comments on the Pebble Project Draft Environmental Baseline Studies Proposed 2005 Quality Assurance Project Plan, dated March 4, 2005. EPA appreciates the timely submittal of this document and the opportunity to review and comment.

EPA does not routinely approve as a signatory Quality Assurance Project Plans of this type. As such, please delete the EPA signature line from the Title and Approval sheet, page 1-2. However, Agency staff have reviewed the document for completeness and accuracy.

Overall, this plan represents a well thought out and complete sample collection and analysis program. No significant deficiencies were noted in the plan, although several comments and recommendations are provided in the following section.

Specific Comments

Table 1-3 (page 1-5)

Replace Cindi Godsey with Dianne Soderlund as the Pebble Project Manager.

Table 1-5 (page 1-11)

Mercury is not represented in the footnotes for Trace Elements/Inorganics in water or sediments.

Table 1-9 (page 1-14)

For your consideration, the "Withdrawal from Federal Regulations of the Applicability to Alaska's Waters of Human Health Criteria" was published in the Federal Register on March 2, 1998 [63 FR 10140] and became effective on April 1, 1998. This rulemaking withdrew the human health criteria for arsenic for Alaska and made the drinking water maximum contaminant level (MCL) of 50 ug/L, the applicable standard protective of the designated uses of the receiving waters. However, ADEC is expected to adopt the new MCL of 10 ug/L in 2005.

Also for your consideration regarding Table 1-9, Volatile and Semi-Volatile Organic Compounds criteria are expressed in mg/L while metals and pesticides criteria are expressed in ug/L. Because of the potential for error in conversions and data table presentation between mg/L and ug/L, to the degree practicable EPA encourages the use of the same units in data tables and analysis programs.

Section 1.6, Quality Objectives Criteria

Table 1-10 of this section identifies levels of concern in soils and sediments for a group of Polyaromatic Hydrocarbons (under the heading *Semivolatile Organic Compounds*), however, the analysis of these compounds in soils/sediments is not addressed (Tables 1-5, 1-6, 1-12 and 1-16). Please provide the rationale for why these compounds aren't being analyzed in soils or sediments.

Section 2.2.2, Field Collection Procedures

EPA recommends photo documentation of field dissected fish specimens for the purpose of providing confirmation of species identification and as an aid in documenting size, species morphology and general condition.

Section 2.4, Laboratory Procedures and Analytical Methods

Copies of the lab's procedures (or reproducible technical synopses) for the tissue and vegetation procedures should be documented as a reference and for comparability purposes in consideration of future monitoring.

Once again, thank-you for the opportunity to review this document. Please do not hesitate to contact me by email or phone (907) 271-3425 if you have any questions or concerns regarding these comments.

Sincerely,

Dianne Soderlund
Pebble Project Manager

cc: Don Matheny, EPA-Sea
Patti McGrath, EPA-Sea
Mike Smith, NDM-Anch